

# Commonwealth of Pennsylvania

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October 2, 2001

DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

PENNSYLVANIA EMERGENCY  
MANAGEMENT AGENCY

Mr. Lake H. Barrett  
Acting Director  
Office of Civilian Radioactive Waste Management  
Department of Energy  
Washington, DC 20585

Dear Mr. Barrett:

Thank you for your letters dated August 21 and August 27, 2001, to Governor Tom Ridge soliciting comments regarding the proposed Yucca Mountain repository for spent nuclear fuel (SNF) and high level radioactive waste. The Commonwealth of Pennsylvania appreciates very much the policy of the Department of Energy (DOE) to keep the states apprised of the developments regarding the Yucca Mountain repository and to seek our input. Pennsylvania strongly supports the expeditious development of the SNF repository because it has nine operating nuclear power plants at five sites where SNF is being stored. Unfortunately, due to the lack of a permanent repository, Pennsylvania has now accumulated one of the largest inventories of SNF in the nation.

The spent fuel pools at some of our nuclear power plants have filled to or near capacity. As a result, two nuclear power plant sites have been forced to add on-site dry storage capacity, which is very expensive to build and maintain. The expenses associated with construction and maintenance of dry storage capacities in Pennsylvania are eventually paid by the consumers of electricity. In addition, since 1983, Pennsylvania electric consumers have been making obligatory payments to the Nuclear Waste Fund (NWF) towards the development of the repository, which is required under the federal Nuclear Waste Policy Act of 1982. The utilities and consumers of Pennsylvania are very much disappointed with the federal government because, after having paid millions of dollars, there is presently no licensed repository to accept the SNF in the United States. We would also note that the nuclear plant sites are not suitable for permanent storage of SNF from the point of view of public health and safety. These reactor sites are located near rivers and other large bodies of water, which make them unacceptable locations for storing SNF for a long period of time.

The Commonwealth of Pennsylvania considers transportation of SNF according to prescribed safety standards as an acceptable risk, and is well aware of the excellent safety record of the SNF transportation in the United States. For example, during 1986 through 1990, 40 shipments of the damaged nuclear fuel were safely transported to Idaho from the Three Mile Island Nuclear Station near Harrisburg, Pennsylvania. We believe that leaving SNF at the nuclear power plant sites for a long period of time poses a much greater threat to the health and safety of the public than transporting it to a federal repository.

Mr. Lake H. Barrett

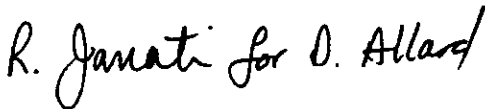
- 2 -

October 2, 2001

Therefore, should the Secretary of Energy determine that the scientific analysis indicates that the Yucca Mountain site is likely to meet the applicable radiation protection standards established by the Nuclear Regulatory Commission, Pennsylvania will urge the Secretary to recommend the site to the President as soon as possible.

Thank you again for the opportunity to provide comments regarding the proposed Yucca Mountain repository.

Sincerely,



David J. Allard, CHP  
Director  
Bureau of Radiation Protection

Sincerely,



David L. Smith  
Director  
Pennsylvania Emergency Management Agency

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2